



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Bureau of Case Management

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Patricia Simmons-Pierre
Remedial Project Manager
USEPA Region 2
290 Broadway, 20th Floor
New York, NY 10007-1866

September 7, 2016

Re: L. E. Carpenter (LE)
Wharton, Morris County, New Jersey
SRP PI# 003017

Dear Ms. Simmons-Pierre:

The New Jersey Department of Environmental Protection (Department) has completed a review of the "Ecological Evaluation Report (EER) Rockaway River and Eastern Drainage Ditch (EDD)" dated August 2016, submitted pursuant to CERCLA and the Technical Requirements for Site Remediation at N.J.A.C. 7:26E (Tech Rules).

The NJDEP has the following comments.

1. Page 4-2, Section 4.1.1, Surface Water – Background surface water sample SW-EDD-B2 may be impacted by the immediately upgradient site and therefore considered unsuitable as a surface water background reference area sample.
2. The NJDEP Severe Effects level (SEL) Ecological sediment Screening Criterion (ESC) for DEHP is 0.750 ppm. The Low Effects Level (LEL) ESC is 0.182 ppm. NJDEP does not recognize the 2.65 ppm DEHP Probable Effects Level (MacDonald, 1994) utilized in Table 4-2 of the EER or the "NJDEP ESC of 1.0 ug/l (based on the PQL)" referenced on page 4-6.
3. Figures 3 and 4, and Table 4-3 – Pore water sample results from samples (PW-R-01, -08, and -09) collected along the left bank in the Rockaway River (Figure 3 and Table 4-3) clearly indicate an area of contaminated groundwater discharge (DEHP) representing a risk to benthic/aquatic biota. Likewise, sediment sample results collected in the EDD show DEHP contamination and risk to benthic/aquatic biota (Figure 4). The EER cannot dismiss these risks, regardless of their estimated magnitude.
4. Page 4-10 – One "upstream background" sediment sample (SED-RR-TA-LB) with a positive detection of DEHP is not representative of background. Six (6) other sediment samples collected in this "Rockaway River Upstream" area were essentially non-detect for DEHP.
5. NJDEP supports the EER recommendation/conclusion to evaluate engineering alternatives to address affected sediment in the EDD. Due to the continuing discharge of ground water contaminated with DEHP, NJDEP also recommends continued regular monitoring of pore water, surface water, and sediments in both the Rockaway River and the EDD for DEHP.



Please incorporate this comment into the letter that the USEPA will be sending to L.E. Carpenter.

If you have any questions regarding this matter I may be contacted at (609) 633-1416, or at Anthony.Cinque@dep.state.nj.us.

Sincerely,



Anthony Cinque, Case Manager
Bureau of Case Management

cc: Steve Byrnes, NJDEP/BEERA
Daryl Clark, NJDEP/BGWPA
Grace Jacob, NJDEP/ONRD